

The Honorable Marsha J. Pechman

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

IN RE WASHINGTON MUTUAL
MORTGAGE BACKED SECURITIES
LITIGATION,

This Document Relates to: ALL CASES

MASTER CASE NO. C09-037 MJP

**DECLARATION OF MICHAEL A.
PASKIN IN SUPPORT OF
DEFENDANTS' MOTION TO SEAL**

Declaration of Michael A. Paskin in Support of
Defendants' Motion to Seal
(CV09-037 MJP)

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1 I, Michael A. Paskin, hereby declare as follows under penalty of perjury:

2 1. I am an attorney at law licensed to practice in the State of New York. I am
3 a member of the firm of Cravath, Swaine & Moore LLP, counsel of record for
4 Defendants WaMu Asset Acceptance Corp. and WaMu Capital Corp. in this matter. I
5 submit this declaration in support of Defendants' Motion to Seal certain exhibits to the
6 April 25, 2012 Declaration of J. Wesley Earnhardt in Support of Defendants' Motion to
7 Exclude the Proffered Expert Testimony of Charles D. Cowan and Ira Holt (the
8 "Earnhardt Declaration"). By virtue of my representation of Defendants in this matter, I
9 have personal knowledge of the facts set forth below, and could and would testify
10 competently to those facts if called to do so.

11 2. Exhibits 6 and 7 to the Earnhardt Declaration are Excel spreadsheets
12 containing data generated by Plaintiffs' proposed re-underwriting expert, Mr. Holt, and
13 his team during their review of a sample of 424 loans that underlie the securitizations at
14 issue.

15 3. That data purports to summarize and reflect loan-level information
16 obtained directly from the relevant loan applications submitted by borrowers and the loan
17 files generated in connection with those applications. This includes, among other things,
18 sensitive nonpublic personal and financial information about individual borrowers,
19 including borrower income, assets, employment history, credit history and other personal
20 information.

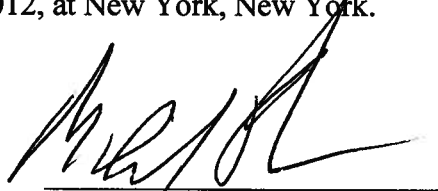
21 4. Accordingly, Defendants designated the loan files that served as a source
22 of the data in Exhibit 6 and 7 "Confidential" pursuant to the applicable Protective Order
23 when they produced them in this litigation.
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1 5. Although Exhibits 6 and 7 do not contain borrower names, it is my
2 understanding that the loan numbers they do contain potentially could be used to match
3 the private information contained therein to individual borrowers.

4 I hereby declare, under penalty of perjury under the laws of the United
5 States of America, that the foregoing is true and correct.

6 DATED this 25th day of April, 2012, at New York, New York.

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Michael A. Paskin

CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of April, 2012, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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20 DATED this 25th day of April, 2012 at Seattle, Washington.

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